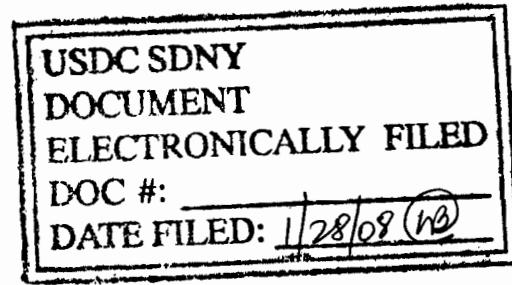


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TILLIE SALTZMAN, Individually and On )  
Behalf of All Others Similarly Situated, ) CIVIL ACTION NO. 07-9901-SHS  
Plaintiff, )  
vs. )  
CITIGROUP INC., CHARLES O. PRINCE, )  
ROBERT E. RUBIN, STEPHEN R. VOLK, )  
SALLIE L. KRAWCHECK, GARY L. )  
CRITTENDEN and ROBERT DRUSKIN, )  
Defendants. )

LENNARD HAMMERSCHLAG, )  
Individually, and On Behalf of All Others ) CIVIL ACTION NO. 07-10258-~~EBS~~(SHS)  
Similarly Situated, )  
Plaintiff, )  
vs. )  
CITIGROUP INC., CHARLES PRINCE, )  
SALLIE KRAWCHECK, GARY )  
CRITTENDEN, )  
Defendants. )



NOTICE OF MOTION OF THE OHIO STATE TEACHERS RETIREMENT  
SYSTEM AND THE ATTORNEY GENERAL OF THE STATE OF OHIO TO  
DISQUALIFY COUNSEL

+ ORDER SETTING  
A RETURN DATE

*Feb 8, 2008 at 2 p.m.*

PLEASE TAKE NOTICE that on a ~~date and time as may be set by the Court~~, before the Honorable Sidney H. Stein, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007, the State Teachers Retirement System of Ohio (“Ohio STRS”), and the Attorney General of the State of Ohio (the “Ohio Attorney General” and, with Ohio STRS, “Ohio”) will respectfully move this Court for entry of an Order disqualifying Schiffrian Barroway Topaz & Kessler, LLP (“Schiffrian Barroway”) and Entwistle & Cappucci LLP (“Entwistle”) from representing the Global Pension Funds<sup>1</sup> or otherwise acting adversely to the interests of Ohio in this matter.

This Motion is supported by the accompanying Memorandum of Law in support thereof, the Declaration of Honorable Marc Dann and William J. Neville filed herewith, the Declaration of Professor Bruce A. Green filed herewith, the pleadings and other files, and such other written or oral argument as may be permitted by the Court.

Based on the foregoing, Ohio respectfully requests that the Court issue an Order disqualifying Schiffrian Barroway and Entwistle from representing the Global Pension Funds in opposition to Ohio or otherwise acting adversely to the interests of

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<sup>1</sup> Schiffrian Barroway and Entwistle represent the “Global Pension Funds” group. The Global Pension Funds are comprised of the Public Employees’ Retirement Association of Colorado (“Colorado PERA”), Tennessee Consolidated Retirement System (“TCRS”), Sjunde AP-Fonden (“AP7”), Fjärde APFonden, (“AP4”), and Pensionskassernes Administration A/S (“PKA”).

Ohio in this matter and grant such other and further relief as the Court may deem just and

proper.

Dated: January 25, 2008

*Answering papers due by Jan 31, reply papers by Feb. 5.  
The Danner Wurll affidavit memorandum will be filed after seal.*

Respectfully submitted,

**MARC DANN**  
**ATTORNEY GENERAL OF OHIO**

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Retirement System*

*Counsel to the Office of the Ohio  
Attorney General and the Ohio State  
Teachers' Retirement System*

1/25/08  
S ordered  
JLW